



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

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OFFICE OF  
ECOSYSTEMS,  
TRIBAL AND PUBLIC  
AFFAIRS

October 26, 2015

Lois Hill  
Interdisciplinary Team Lead  
Nez Perce-Clearwater National Forest  
903 3<sup>rd</sup> Street  
Kamiah, Idaho 83536

Dear Ms. Hill:

We have reviewed the Final EIS and draft Record of Decision for the Clear Creek Integrated Restoration Project located on the Nez Perce-Clearwater National Forests within the Clear Creek drainage (EPA Project Number 12-4142-AFS). Our review was conducted in accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act.

The EPA provided comments on the draft EIS supporting the collaborative process under the Collaborative Forest Landscape Restoration Program and activities under the Proposed Action, Alternative B. In response to public comments on the draft EIS and after further analysis of laminated root rot infected stands, the USFS selected Alternative C in the draft Record of Decision. As a result, Alternative C would include more regeneration harvest (4,156 acres) on affected areas than proposed in Alternative B (2,609 acres).

Our comments on Alternative B also included a suggestion to clarify how the USFS intends to reduce road densities in the watershed to the recommended  $<1 \text{ mi/mi}^2$  ratio to achieve improved watershed conditions. While our comments focused on the Proposed Action, both Alternatives B and C include 27.6 miles of temporary roads that would be decommissioned after project completion.

In order to clarify some of the new information in the final EIS, we contacted your agency during our review. We appreciate your time in responding to our questions regarding the increase in regeneration harvest and clarification regarding road densities. The discussion provided a greater understanding of the decision for selecting Alternative C. We acknowledge the need to more aggressively address root rot on the forest to promote a more resilient landscape. We also acknowledge that while 26.7 miles of proposed roads appears significant, the segments are less than 600 feet and would be decommissioned within two years. Additionally, we understand that the Forest Service is continually implementing watershed improvement projects that include road decommissioning/improvements in the watershed outside of this proposal.

Overall, we support the goals to restore natural disturbance patterns; improve long-term resistance at the landscape level; reduce fuels; improve watershed conditions; improve early seral wildlife habitat; and maintain habitat structure, function, and diversity. We are pleased with the mitigation and monitoring commitments and that a portion of Forest Service monitoring includes funding allocated through the Collaborative Landscape Restoration Act.

Based on our review and discussions, it appears that Alternative C will result in a more resilient forest by implementing regeneration harvest with variable retention to address root rot infected stands and establishing historic, more resistant species such as white pine and ponderosa pine. However, we note that the final EIS is unclear about which alternative or alternatives would be considered "environmentally preferable." The Council of Environmental Quality regulations direct federal agencies to identify such alternative(s) in the Record of Decision (40CFR §1505.2). Although there is no requirement to select an environmentally preferable alternative, providing a clear understanding of alternatives that cause the least damage to the biological and physical environment is an important aspect of decision making and the NEPA process. The Record of Decision should be revised to include identification of the environmentally preferable alternative(s).

We appreciate the opportunity to review and comment on the final EIS. If you have any questions about our review, please contact me at 206-553-1601, or by electronic mail at [reichgott.christine@epa.gov](mailto:reichgott.christine@epa.gov). Or you may contact Lynne Hood of my staff at 208-378-5757 or by electronic mail at [hood.lynne@epa.gov](mailto:hood.lynne@epa.gov).

Sincerely,



Christine B. Littleton, Manager  
Environmental Review and Sediment Management Unit